

MEMO ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KAHLEA BALDWIN,

Plaintiffs,

-against-

TARGET CORPORATION and
GROOM CONSTRUCTION CO., INC.,

Defendants.
-----X

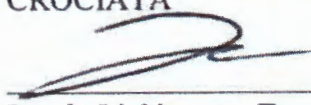
Case No. 7:14-CV-09138

NOTICE OF MOTION TO VACATE
THE ARBITRATION AWARD

PLEASE TAKE NOTICE that upon the attached memorandum of law with exhibits, Defendant GROOM CONSTRUCTION CO., INC. will move this Court, The Honorable Judge Karas, U.S.D.J., United States District Court for the Southern District of New York, located at 300 Quarropas Street in White Plains, New York, on a date and at a time designated by the Court for counsel to be heard, for an order pursuant to the Federal Rules of Civil Procedure vacating the Arbitration Award entered November 25, 2019, on the basis that the arbitrator manifestly disregarded the law and exceeded his authority, in violation of Section 10(a) of the Federal Arbitration Act and federal jurisprudence.

BONNER KIERNAN TREBACH &
CROCIATA

Dated: New York, New York
February 26, 2020


Lynda Liebhauser, Esq.
Attorneys for Defendant Groom
Construction Co., Inc.

To: Mitchell Levine, Esq.
Fishman McIntyre Levine Smansky, PC
44 Wall Street, 12th Floor
New York, New York 10005
Fax: 845-369-0673
Attorneys for Co-Defendant Target Corporation

Motion is denied for failure
to comply with the Court's
Individual Practices.

See Order at
12 MK 2/27/20

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AFFIRMATION OF SERVICE

I, Lynda Liebhauser, declare under penalty of perjury that on February 26, 2020, I served a copy of the attached motion to vacate the arbitration award with supporting documents upon counsel for co-defendant Target Corporation by mailing and emailing it as follows:

Mitchell Levine, Esq.
Fishman McIntyre Levine Smansky, PC
44 Wall Street, 12th Floor
New York, New York 10005
(212) 461-7190
janet@fishmanmcintyre.com

Dated: New York, New York
February 26, 2020

BONNER KIERNAN TREBACH &
CROCIATA



Lynda Liebhauser, Esq.
350 Fifth Avenue - 59th Floor
New York, New York 10118
(212) 268-7535
*Attorneys for Defendant Groom
Construction Co., Inc.*